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Lead Counsel for the Direct Purchaser Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
LITIGATION**

Master File No. 4:07-md-01819-CW

MDL No. 1819

This Document Relates to:

**ALL DIRECT PURCHASER
ACTIONS**

**STIPULATION AND ORDER TO
SHORTEN TIME ON HEARING ON
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENTS WITH
SAMSUNG AND CYPRESS AND PLAN OF
ALLOCATION, AND ISSUANCE OF
CLASS NOTICE; AND FURTHER
REQUEST THAT SUCH MOTION BE
DECIDED WITHOUT HEARING**

[Civ. L.R. 6-2, 7-12; FRCP 78(b)]

Judge: Hon. Claudia Wilken, Courtroom 2

1 WHEREAS, Plaintiff is concurrently filing a Motion for Preliminary Approval of
 2 Settlements with Samsung and Cypress and Plan of Allocation, and Issuance of Class Notice
 3 (“Preliminary Approval Motion”) which asks this Court to:

- 4 (i) grant preliminary approval of each of the settlement agreements Plaintiff has
 5 executed on behalf of the class of direct purchasers with Cypress Semiconductor
 6 Corporation (“Cypress” and “Cypress Settlement”) and Samsung Electronics
 7 Company, Ltd. and Samsung Semiconductor, Inc. (collectively “Samsung” and
 8 “Samsung Settlement”), as well as the proposed plan of allocation related to those
 9 settlements;
- 10 (ii) approve the manner and form of giving notice to class members of the matters set
 11 forth in: the Preliminary Approval Motion and the concurrently-filed Notice of
 12 Motion and Motion for Award of Attorney’s Fees, Reimbursement of Expenses,
 13 and Incentive Award (“Attorney’s Fees Motion”); and,
- 14 (iii) establish a timetable for: issuing such notice to class members; lodging
 15 objections, if any, to the matters in such class notice; filing briefs in support of
 16 final approval of the Cypress Settlement and the Samsung Settlement
 17 (the “Settlements”) and the related plan of allocation, and in response to
 18 objections, if any, to the matters in the concurrently-filed Attorney’s Fees Motion;
 19 and, holding a hearing regarding final approval of the Settlements and the related
 20 plan of allocation.

21 WHEREAS, Cypress and Samsung support the relief sought in the Preliminary Approval
 22 Motion;

23 WHEREAS, Plaintiff, Cypress, and Samsung – all of the affected parties (the “Parties”) –
 24 agree that, pursuant to Civil Local Rules 6-2 and 7-12, there is no reason that the Preliminary
 25 Approval Motion could not be heard on shortened time on March 24, 2011 (and that no other
 26 request to shorten time has been made);

27 WHEREAS, the Parties further agree that, pursuant to Fed. R. Civ. Proc. 78(b), the
 28 Preliminary Approval Motion can actually be decided on the papers and without hearing;

1 WHEREAS, the Parties believe that proceeding either on shortened time or having the
2 motion decided on the papers without hearing will expedite the fair and just resolution of this
3 case;

4 NOW THEREFORE, **IT IS HEREBY STIPULATED** by the undersigned counsel on
5 behalf of the parties identified below, and subject to the Court's approval and preference, that
6 they agree to either of the below options:

7 The Preliminary Approval Motion may be decided on the papers without hearing.

8 The Preliminary Approval Motion may be heard on shortened time on March 24, 2011 at
9 2:00 p.m.

10 Respectfully submitted,

11 Dated: March 11, 2009

COTCHETT, PITRE & McCARTHY, LLP

12 By: /s/ Steven N. Williams
13 STEVEN N. WILLIAMS

14 *Lead Counsel for the Direct Purchaser Class*

15 SHEPPARD MULLIN RICHTER & HAMPTON LLP

16 By: /s/ Michael W. Scarborough
17 MICHAEL W. SCARBOROUGH

18 *Attorneys for Samsung Electronics Co., Ltd. and*
19 *Samsung Semiconductor, Inc.*

20 MAYER BROWN LLP

21 By: /s/ Lee Rubin
22 LEE RUBIN

23 *Attorneys for Cypress Semiconductor Corp.*

24 **ATTESTATION OF FILING**

25 I, Steven N. Williams, hereby attest, pursuant to N.D. Cal. General Order No. 45, that
26 the concurrence to the filing of this document has been obtained from each signatory hereto.

27 By: /s/ Steven N. Williams
28 STEVEN N. WILLIAMS

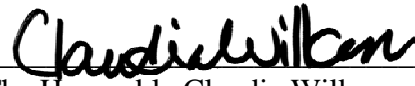
1 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

2 [CHECK ONLY ONE]

3
4 X The Preliminary Approval Motion shall be decided on the papers without hearing.

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6 The Preliminary Approval Motion shall be heard on shortened time on March 24,
7 2011 at 2:00 p.m.

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9 Dated: 3/14/2011

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12 _____
13 The Honorable Claudia Wilken
14 United States District Judge
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